

OCT 10 2012

Bell Laboratories Inc.
Class R Research Facility
Customer No: 636
Certificate No: 35-R-0107

Optional Column E Explanation Form:

1. Registration Number: 35-R-0107
2. 34 animals used in tests involving accompanying pain or distress without the administration of appropriate anesthetic, analgesic or tranquilizing drugs.
3. Species (Eastern mole) *Scalopus aquaticus*
4. Feeding Efficacy studies were conducted utilizing Eastern moles allowed to orally ingest mole toxicant formulations containing the following active ingredient and concentration:

0.0250% bromethalin

Bell Laboratories, Inc., feeding efficacy trials were conducted in accordance with Bell Laboratories' Test Method BIO528.1 referenced from EPA Test Method 1.209 (10/08/91) and the Environmental Protection Agency, Efficacy Data, 40 CFR §158.640.

Animals in both the test and control groups, sexes equal, are acclimated to the test conditions for at least three days. The test and control animals are single housed during the test period. Nightcrawlers and test diet are provided in excess of the daily food requirements for moles. Dietary consumption was recorded at 24 hours \pm 2 hours intervals post diet introduction. The weight, sex, and study day and dates of death are recorded for each animal. The test and control groups are maintained for a fixed number of test days as dictated by protocol. Evaluation of product efficacy requires that the parameters of taste acceptance, its toxic effects and resulting mortality of the mole toxicant be observed and recorded to ensure satisfaction of acute bait product performance criterion as outlined in EPA Test Method 1.209.

Therefore, we are unable to intervene with analgesia and or other accepted forms of pain management if the animal shows signs of distress and or toxic effects.

Justification

5. The Eastern Mole was used because it is the target species of the mole toxicant identified in US EPA Subdivision G: Product Performance; Series 96 Efficacy of Vertebrate Control Agents 96-8 Mole Toxicants-Eastern, Townsend's, Starnose, California Moles.